

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

Whitney Main, Henry Schmidt, and Daniel Grentz,  
individually and as representatives of a class of  
similarly situated persons, and on behalf of the  
American Airlines, Inc., 401(k) Plan,

Plaintiffs,

v.

American Airlines, Inc., American Beacon Advisors,  
Inc., Pension Asset Administration Committee,  
Benefits Strategy Committee, Pension Benefits  
Administration Committee, and Employee Benefits  
Committee,

Defendants.

**Case No. 4-16-cv-473-O**

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23(e), this Court's Order dated October 23, 2017 (ECF No. 128), and Article 4 of the Parties' Class Action Settlement Agreement (ECF No. 127-2), Plaintiffs Whitney Main, Henry Schmidt, and Daniel Grentz respectfully move this Court for an order granting final approval of the Parties' proposed Class Action Settlement Agreement. A proposed Final Approval Order is being submitted in connection with this motion and is also attached as an exhibit to the Settlement Agreement (see ECF No. 127-7). This motion is based on the accompanying Memorandum of Law; the contemporaneously-filed the Declarations of Kai Richter and Michelle Kopperud, and exhibits thereto; the Settlement Agreement; and all files, records and proceedings in this matter.

Dated: February 7, 2018

Respectfully submitted,

/s/ Kai H. Richter

NICHOLS KASTER, PLLP

Kai H. Richter, MN Bar No. 0296545\*

Carl F. Engstrom, MN Bar No. 0396298\*

Paul Lukas, MN Bar No. 22084X\*

Brandon T. McDonough, MN Bar No. 0393259\*

Brock J. Specht, MN Bar. No. 0388343\*

\* admitted *pro hac vice*

4600 IDS Center, 80 S 8th Street

Minneapolis, MN 55402

Telephone: 612-256-3200

Facsimile: 612-338-4878

krichter@nka.com

cengstrom@nka.com

lukas@nka.com

bmcDonough@nka.com

bspecht@nka.com

KENDALL LAW GROUP, PLLC

Joe Kendall, Texas Bar No. 11260700

Jody Rudman, Texas Bar No. 00797356

3232 McKinney Avenue, Suite 700

Dallas, Texas 75204

214-744-3000 / 214-744-3015 (Facsimile)

jkendall@kendalllawgroup.com

jrudman@kendalllawgroup.com

ATTORNEYS FOR PLAINTIFFS AND THE  
SETTLEMENT CLASS

**CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred with respective counsel of record for Defendants with respect to this motion. This motion is not opposed by Defendants as parties to the Settlement Agreement.

Date: February 7, 2018

/s/ Kai H. Richter

Kai H. Richter

**CERTIFICATE OF SERVICE**

I hereby certify that on February 7, 2018, a true and correct copy of **PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT** was served via CM/ECF to the parties registered to the Court's CM/ECF system.

*/s/ Kai H. Richter* \_\_\_\_\_

Kai H. Richter